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Attorneys for Defendants
BP SOLUTIONS LLC and AYR WELLNESS LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHASE PAYNE, individually and on behalf
of all other similarly situated,

Plaintiffs,

v.

BP SOLUTIONS LLC; AYR WELLNESS
HOLDINGS LLC,
EMPLOYEE(S)/AGENT(S) DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive

Defendants.

Case No. 2:21-cv-01578-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1-1)**

(First Request)

On July 20, 2021, Plaintiff Chase Payne (“Plaintiff”) initiated this action by filing a complaint in the Eighth Judicial District Court of Nevada. Plaintiff served Defendants BP Solutions LLC and Ayr Wellness Holdings LLC (“Defendants”) with a summons and the complaint on July 27, 2021. Thereafter, on August 26, 2021, Defendants removed this action to this Court on the basis of federal question jurisdiction. Defendants did not respond to Plaintiff’s complaint before removal. Therefore, Defendants’ responses are due on September 2, 2021. (See FRCP 81(c)(2)(C).)

King Durham is serving as local counsel for Defendants in this matter. Lead foreign counsel (who intend to petition this Court for admission *pro hac vice*) and Defendants’ client contact are going to be out of the office over the next few weeks on pre-planned trips. Therefore, Defendants need additional time to gather information respond to Plaintiff’s complaint.

1 Accordingly, Plaintiff and Defendants, by and through their respective counsel, hereby
2 stipulate and agree that Defendants shall have an extension until October 1, 2021, to file their
3 responses to Plaintiff's complaint. This is the first request for such an extension.

4 DATED: August 27, 2021

GABROY LAW OFFICES

6 By /s/ Kaine M. Messer

7 Christian J. Gabroy, NV Bar No. 8805
8 Kaine M. Messer, NV Bar No. 14240
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Attorneys for Plaintiff
CHASE PAYNE

12 DATED: August 27, 2021

KING & DURHAM PLLC

15 By /s/ Matthew L. Durham

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Attorneys for Defendants
BP SOLUTIONS LLC and
AYR WELLNESS LLC

24 **Order**

25 **IT IS SO ORDERED**

26 **DATED:** 5:29 pm, August 30, 2021

27 

28 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE

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